Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the Matter of	)	
	)	
Inquiry Concerning Deployment of	)	GN Docket No. 19-285
Advanced Telecommunications Capability	)	
of All Americans in a Reasonable and	)	
Timely Fashion	)	

COMMENTS OF THE FIBER BROADBAND ASSOCIATION ON THE FIFTEENTH BROADBAND DEPLOYMENT REPORT NOTICE OF INQUIRY

The Fiber Broadband Association ("FBA")[1] hereby submits comments in response to the Federal Communications Commission's ("FCC" or "Commission") Notice of Inquiry ("NOI") on the Fifteenth Broadband Deployment Report.[2] FBA supports the Commission's approach to assessing advanced telecommunications capability based on the progress of deployments, but, as discussed below, it asserts the Commission should amend its evaluation framework from one based solely on speed to one based on overall advanced telecommunications experience and should adjust its current speed benchmark upwards to reflect existing and near term capabilities.

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1 FBA is a not for profit trade association with more than 250 members, including telecommunications, computing, networking, system integration, engineering, and content-provider companies, as well as traditional service providers, utilities, and municipalities. Its mission is to accelerate deployment of all-fiber access networks by demonstrating how fiber-enabled applications and solutions create value for service providers and their customers, promote economic development, and enhance quality of life. A complete list of FBA members can be found on the organization's website: https://www.fiberbroadband.org/.

2 *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 19-285, Notice of Inquiry, FCC 19-102 (rel. Oct. 23, 2019) ("NOI").

I. TO REFLECT CONSUMERS' FOCUS ON THE OVERALL ADVANCED TELECOMMUNICATIONS EXPERIENCE, THE COMMISSION SHOULD DEVELOP AN EVALUATION METRIC THAT RELIES ON MORE THAN SPEED TO DETERMINE WHETHER ADVANCED TELECOMMUNICATIONS CAPABILITY IS BEING DEPLOYED IN A REASONABLE AND TIMELY FASHION

The Commission proposes to continue to evaluate the existence of advanced telecommunications capability based solely on downstream speed.[3] Yet, as discussed below, consumers have moved on from judging the capability of their advanced telecommunications service based only on speed, especially downstream speed. Rather, they are evaluating this capability based on additional characteristics of the service, and FBA submits the Commission should evolve as well by evaluating advanced telecommunications capability based on an overall consumer experience metric.

For many years, because consumers were predominantly interested in receiving text, photos, and video streams, they evaluated the capability of their advanced telecommunications service based solely on downstream speed. Today, however, while consumers continue to care about downstream speed capabilities, they have turned into producers, sending massive amounts of content, and now want access to robust upstream capabilities. In addition, because they are accessing time-sensitive applications, they are demanding services with low latency. And, it appears that above all, they place a premium on reliable service.

So far, no one has developed a single metric that wraps up all these critical aspects of consumers' advanced telecommunications experience. For that reason, FBA, whose service provider members build, operate, and market the capabilities of high-performance all-fiber networks, turned to RVA LLC, a market research and consulting firm, and the technical

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[3] NOI, ¶ 9.

expertise of its members to capture this new dynamic and develop a transparent and consistent methodology to capture the critical performance and network characteristics of broadband networks. FBA released an initial version of this broadband experience metric, which focused on the Commission's proposed Rural Digital Opportunity Fund weighting methodology, earlier this year.[4] Its metric is based on the three broadband performance factors—reliability, bandwidth, and latency—that consumers value above all others to assess the quality of broadband service. FBA then evaluated each of these factors using four data sources.[5] The raw data was then converted into percentiles and averaged to determine a broadband experience rating.

In sum, because a broadband experience metric would better reflect how consumers are increasingly examining broadband service, the time has come for the Commission to develop its own broadband experience metric for use in this and future Broadband Deployment Report proceedings. FBA believes the metric it developed provides a good starting point and offers to make RVA and its technical experts available to the Commission to assist in this work.

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4 *See* Reply Comments of the Fiber Broadband Association, WC Docket Nos. 19-126 and 10-90, at 11-16 and Appendix A (Oct. 21, 2019)

5 2019 RVA Consumer Broadband Study Performance Measurements – RVA directly measured speed and latency through automatic and self-reported speed tests; FCC Operator Performance Measurements – These measurements represent the most recent data from the 2017 FCC "Measuring Broadband America" report; 2019 RVA Consumer Broadband Study Attitudinal Measurements – RVA indirectly measured broadband reliability by asking users to recall and report the number of times they had technical issues with their service; and, 2019 RVA Consumer Broadband Study Net Promoter Score Index – This score is "a fairly common indicator of overall relative satisfaction and the likelihood of recommending a product or service to a friend."

II. THE COMMISSION SHOULD ADJUST ITS CURRENT SPEED BENCHMARK UPWARDS TO REFLECT MARKET CONDITIONS

Regardless of whether the Commission amends its evaluation framework to include all relevant elements of the advanced telecommunications capability experience, it needs to increase its current speed benchmark from 25/3 Mbps to at least 100/10 Mbps, and preferably higher, to reflect current and near term use.[6] According to the Commission's most recent "Internet Access Services" report, of the 108.2 million fixed broadband connections in service in 2017, most—40.6 million—are at downstream speeds of at least 100 Mbps.[7] These high-speed connections increased by more than four times from 2014 to 2017. The tier with the next highest number of connections is the 25-100 Mbps tier, which started at 34.0 million connections in 2014, rose to 40.8 million connections in mid-2016, and then declined to 34.1 million connections by the end of 2017, which indicates that consumers are shifting from this tier to higher speed tiers. Connections in every other tier declined every reporting period between 2014 and 2017. Thus, the tier with the greatest number of connections—as well as the tier where connections are increasing most rapidly—is the 100 Mbps tier. (There is not data in this report on tiers above 100 Mbps.) Moreover, these data are almost two years old. Given the trends, one would expect that approximately 66% of the connections today would be in tiers with speeds greater than 100

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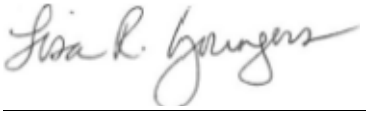
6 In previous filings in Broadband Deployment Report proceedings, FBA has recommended that the Commission either establish a 1 Gbps benchmark or an all-fiber benchmark. Should the Commission continue to resist the inevitability that consumers will advanced telecommunications capability in this manner, it should at least adopt in this proceeding a 100/10 Mbps benchmark. *See e.g.*, Comments of the Fiber Broadband Association on the Thirteenth Broadband Deployment Report Notice of Inquiry, GN Docket No. 17-199, at 2-6 (Sept. 21, 2017).

7 "Internet Access Services: Status as of December 31, 2017," Industry Analysis Division, Office of Economics & Analytics, Federal Communications Commission, Figs. 3 and 5 (Aug. 2019) ("Internet Access Services Report").

Mbps. These data are consistent with the 2018 data produced by Ookla, which found that in mid-2018, average download speed for fixed service was 96.25 Mbps and upload speed was 32.88 Mbps.[8]

Respectfully Submitted,



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[8] *See* "Fixed Broadband Speedtest Data, Q2-Q3 2018 United States," Ookla, (Dec. 12, 2018), available at: https://www.speedtest.net/reports/united-states/2018/#fixed (last visited Nov. 21, 2019).